

ANDREW W. BALDWIN (*pro hac vice*)
BERTHENIA CROCKER (*pro hac vice*)
KELLY A. RUDD (*pro hac vice*)
MANDI A. VUINOVICH
BALDWIN, CROCKER & RUDD, P.C.
P.O. Box 1229
Lander, WY 82520-1229
(307) 332-3385
andy@bcrattorneys.com
berthenia@bcrattorneys.com
rudd@bcrattorneys.com
mj@bcrattorneys.com

Attorneys for Plaintiff

CHAD A. READLER
Acting Assistant Attorney General
Civil Division

LIEF M. JOHNSON
Acting United States Attorney
VICTORIA L. FRANCIS
Assistant U.S. Attorney
UNITED STATES ATTORNEY'S
OFFICE
2601 Second Avenue North, Suite
3200
Billings, MT 59101
(406) 247-4633
victoria.francis@usdoj.gov

ERIC R. WOMACK
Assistant Branch Director
JAMES D. TODD, JR.
JOSEPH E. BORSON
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs
Branch
20 Massachusetts Avenue, N.W.
Washington, D.C. 20530
(202) 514-3378
james.todd@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

NORTHERN ARAPAHO TRIBE,

Plaintiff,

v.

DARRYL LaCOUNTE, et al.,

Defendants.

No. 1:16-cv-11-BMM

No. 1:16-cv-60-BMM

(consolidated)

JOINT MOTION TO EXTEND
PARTIES' TIME TO RESPOND TO
MOTION BY SHOSHONE TRIBE
OF WIND RIVER RESERVATION
TO INTERVENE

NORTHERN ARAPAHO TRIBE,

Plaintiff,

v.

U.S. DEPARTMENT OF THE
INTERIOR, et al.,

Defendants.

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and L.R. 7.1(a), and for good cause shown, Plaintiff and Federal Defendants in these consolidated actions jointly move to extend until May 9, 2017, the time to respond to the motion by the Shoshone Tribe of the Wind River Reservation to intervene. Good cause for this extension is set in forth in the accompanying brief.

Pursuant to L.R. 7.1(c)(1), undersigned counsel for Plaintiff, on behalf of both parties, diligently contacted counsel for the Shoshone Tribe about whether the Tribe would consent to an extension of time to respond to the Shoshone Tribe's motion. The Shoshone Tribe does not consent.

Dated: April 20, 2017

s/ Andrew W. Baldwin
ANDREW W. BALDWIN (*pro hac vice*)
BERTHENIA CROCKER (*pro hac vice*)
KELLY A. RUDD (*pro hac vice*)
MANDI A. VUINOVICH
BALDWIN, CROCKER & RUDD, P.C.

Attorneys for Plaintiff

Respectfully Submitted,

CHAD A. READLER
Acting Assistant Attorney General
Civil Division

LIEF M. JOHNSON
Acting United States Attorney
VICTORIA L. FRANCIS
Assistant U.S. Attorney

ERIC R. WOMACK
Assistant Branch Director
Federal Programs Branch

s/ James D. Todd, Jr.
JAMES D. TODD, JR.
JOSEPH E. BORSON
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs
Branch
Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on April 20, 2017, I electronically filed the foregoing filing. Notice of this filing will be sent by email to all parties of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

s/ Andrew W. Baldwin
ANDREW W. BALDWIN (*pro hac vice*)